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**RECORDS MANAGEMENT STAFF PAPER NUMBER 8**

# **IDENTIFYING RECORDS OF CONTINUING VALUE**

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President Theodore Roosevelt stimulated concern about the preservation and use of valuable Government records. His Presidential Committee on Department Methods focused attention on extensive creation of unnecessary records and out-moded record keeping practices. The same Committee on Department Methods criticized the existing practice of storing vast quantities of valuable Government records in unsuitable places and recommended the establishment of a national archival depository. Moreover, the Committee urged that Congress modify existing laws to ensure that records no longer useful for administrative purposes be not destroyed without their appraisal for possible historical interest and research value.

Effective implementation of these recommendations did not come for several years. It began however, under the National Archives Act of 1934 and has continued under other legislation, especially the Records Disposal Act of 1943 and the Federal Records Act of 1950. Under the latter act Federal agencies are required to take proper measures to preserve adequate records concerning their operations. The National Archives and Records Service, GSA, is directed to establish standards for the selective retention of records of continuing value for research and other purposes. Pursuant to these provisions, three major types of retention and disposal standards or records management programs have been developed.

The oldest program uses Records Control Schedules. These devices employed widely by Federal Government agencies since 1943 stipulate the various retention periods for all classes of records of a particular organizational unit and provide for their orderly retirement or disposal. These Schedules are mandatory authorizations for the periodic disposition of records and can be used repeatedly.

The second program inaugurated in 1946, involves the use of General Records Schedules dealing with the disposition of certain types of records common to all major government organizations. The records covered by these Schedules include those pertaining to civilian personnel, fiscal, procurement, and property matters. They constitute a large proportion of the total volume of records created by Federal agencies.

The third program launched in 1962 consists of the preparation of Records Retention Plans designed to identify records of continuing value. The volume and complexity of Federal records make this identification quite difficult. Unfortunately it has been too often neglected in the past. The action of those persons responsible for this neglect has been likened to that of a crew of reapers who, in harvesting a large crop of wheat, cut the weeds with the grain and, without eliminating the weeds or culling the wheat from the chaff stored their reapings in barns and left the wheat unsalvaged. Other crews, instead of

salvaging the wheat, repeated the operation with the result that all the barns in the neighbourhood were filled to overflowing. When all available places were filled, more barns had to be built. The longer the salvaging of the wheat was delayed, obviously the more difficult and costly the task became. The lesson of this story is clear. Economical and efficient salvaging of the wheat would require that the reapers be induced to refrain from harvesting the weeds, to cull the wheat from the chaff at the time of harvesting, and to store the wheat separately so as to facilitate its use.

Records Retention Plans are to be developed by Federal agencies in cooperation with the National Archives and Records Service. There is to be a Plan for each agency or subdivision thereof. By March 31, 1965, plans had been developed for about 100 Federal bureaus and offices having about 4 million cubic feet of records. Less than 5 per cent of these records were designated as having sufficient value to merit permanent retention. Although the principal purpose for preparing the Plans has been to safeguard the records of enduring value, an important by-product has been assistance to agencies in the establishing of realistic disposal periods for records found to lack continuing value.

Agency preparation of a Records Retention Plan normally begins with a careful analysis of the organization, functions, and activities of an agency or subdivision. To this task the archivist and agency records managers may bring a considerable store of information accumulated in research or work such as the review of agency disposal requests, accessioning of agency records, or records reference service. They will study statements concerning the agency in the "U. S. Government Organization Manual", reports of hearings before U. S. Congressional appropriation committees, organizational and functional charts approved for the agency, and published reports and studies concerning agency programs and accomplishments.

The second major step involves a determination of the classes of records produced by each function of the agency. Here the archivist and records managers scrutinize Records Control Schedules, inventories and surveys of records, classification and filing manuals, and records management handbooks. They confer with records and program officials and examine representative portions of current and non-current records.

The next important step in a Records Retention Plan is the selection of types or classes of records under each function that seem to have continuing value. In making this selection there are two principal considerations: (1) the extent to which particular classes of records provide basic documentation of the organization and major program operations of the agency and (2) the extent to which particular classes of records contain useful and unique data about persons, organizations, things, problems, and the like with which an agency dealt. In archival terminology popularized by T. R. Schellenberg, in his book "Modern Archives", the first consideration is known as appraisal for "evidential value" and the second is called appraisal for "informational value".

In selecting records containing important evidence of the organization and general programs of an agency the archivist and records managers locate the master sets of what might be called policy, procedural, organizational, and reportorial documents. Examples of these documents are directives, organizational charts, annual work progress reports, samples of program questionnaires, speeches of top-level officials, and publications dealing comprehensively with program activities. Other records of evidential value that loom large are such as the following: program correspondence showing executive direction and top-level policy formulation and execution, reports of comprehensive audits or inspections, legal opinions and decisions concerning agency operations, minutes of top-level staff meetings, and minutes and reports of major advisory groups.

These classes of records have continuing value for several reasons. To begin with, the records are necessary tools in determining administrative responsibility or explaining official action. As such, they become important instruments in the maintenance of accountability of the Government to its citizens. Such accountability is absolutely essential in a free and democratic society. Moreover, these records are veritable fountains of administrative knowledge and experience from which may flow insight to solve present problems, or what is equally important, wisdom to avoid past mistakes. In this connection one is reminded of the words of the poet and philosopher, George Santayana: "Those who cannot remember the past are condemned to repeat it".

The selection of records containing useful and unique information apart from that about an agency's organization and functions is the most difficult and challenging task in the preparation of a Records Retention Plan. These records constitute the greater proportion of Federal records preserved by the National Archives. They are valued highly by varied individuals, especially the following: historians, genealogists, economists, attorneys, and citizens seeking to protect individual rights. These and other persons place increasing value on public records for the useful and unique information that they often contain concerning persons, events, conditions, materials, and properties. In this large category of records appraised and preserved mainly for informational value, rather than evidence of agency functions, are several large classes of Federal records. Outstanding examples are the following: census schedules, passport applications, pension case files, personnel records, property title papers, diplomatic correspondence, ship logs, weather reports, building plans, patent case files, court dockets, and regulatory hearing transcripts.

In many instances records are found to have important value both for evidence of administrative organization and action. In such cases they happily meet the requirements of the administrator and also serve the needs of the scholar. Elizabeth Drewry, Director of the Franklin D. Roosevelt Library who has had extensive experience in archival reference

service once observed: "It is surprising.....to note how similar are the requirements of the Government investigator who has to use records of his agency for past years in formulating present policies and procedures and the requirements of the historian or the economist or the sociologist who is interested in reconstructing the past." Examples of records that often possess this dual value are general correspondence of top-level staff and line offices, speeches of policy-making officials, comprehensive inspection reports, minutes of meetings, legal opinions, directives, and periodic reports of work progress and accomplishments.

So far we have been discussing primarily the work of archivists and records managers in the records retention program. This work should be followed by actions taken by agency officers and their assistants. It is considered to constitute a second part of the over-all retention planning program. At this stage the records officers are requested to complete a form listing the records series or file groups related to the classes of records initially specified with the aid of the archivists. When completed it should normally show the organizational unit that maintains the records in question and the title or titles by which the records are usually known. In this process the appraisal archivist will provide the records officer such assistance as may be necessary to ensure that the files listed on the form are in fact the types of records designated in the first part of the Retention Plan.

After the archivist and records officer agree as to the particular files designated for retention, the officer should then devise procedures for marking, or otherwise designating, and separating the records in question. Ideally these procedures should involve identification techniques during the period of creation and active administrative use of the records. To begin with, it will be useful to establish the "office of record" for classes of valuable records that tend to be accumulated in several offices. When the "official" series of a particular class has been established, in the "office of record", it can be maintained and retired separately from other material considered to have only short-term reference value.

Classes of valuable records that tend to be created in association with related temporary papers can be made more easily separable under certain file arrangements. For example, subject file headings or separate file groups can be maintained to keep important program records separate from records pertaining only to housekeeping and routine management matters. Then too folders distinguished by position, color, label, or instruction can be used to separate permanent material from the temporary material. The Department of the Army, for example, has a system for marking each file folder with disposition instructions. Furthermore, there is the method of dividing permanent and temporary papers in a case file such as that used in the Federal personnel folder.

In some instances, the segregation of permanent files must await the cut off or retirement process. This is especially true when such files are only selected as samples from large accumulations of material or when they are required to be used frequently in association with temporary files. The marking or flagging of the permanent material at its retirement by knowledgeable file personnel greatly facilitates its preservation whether it is to be transferred to the Archives permanently or to the Records Center temporarily.

Within 6 months after receipt of a Retention Plan an agency is expected to make any revisions in its Control Schedules that may be required to ensure the preservation of the records listed in the Plan. Meanwhile, the Plan also serves as a guide for requesting disposal authority for records not previously controlled by a Schedule. The Plan is to be reviewed annually by the agency in order that it may recommend necessary changes to the National Archives and Records Service in light of possible organizational or functional changes. Periodic inspections will be made by the Agency Records Manager to assure that provisions of the Plan are being implemented.

It is perhaps now evident that retention planning will tend to designate for preservation records dealing with broad policies and procedures, summaries of experiences and actions, overall direction of programs and major phases of programs, principal trends, and similar matters of broad functional significance or historical interest. Normally, in the words of the eminent Belgian archivist, Renee Doehaerd, precedence for retention will be given to documents of "general scope" over documents of "particular scope". Hence, retention of large groups of operating records concerning well-known, standardized, recurring transactions with individuals and organizations will usually be avoided. Perhaps only samples of such records will be preserved to illustrate procedures or experiences. Examples of records susceptible to this treatment are cooperative agreements, contracts, individual loan case files, complaints, claims, appeals, vendor files, and varied regulatory transaction files.

In seeking to preserve permanently only useful and unique groups of records, those preparing Retention Plans will also strive increasingly to avoid recommending the preservation of voluminous records whose basic information is preserved in summary records or contained in widely circulating sources. For example, the Consumer and Marketing Service of the U. S. Department of Agriculture produces in cooperation with State agencies massive files of daily, weekly, monthly, and other periodic market news reports. The information in these reports is disseminated by mail, press, radio, television, telephone, telegraph, bulletin board, trade journal, and farm publication. Hence, a Retention Plan for this Federal agency lists for retention only the annual summary market news reports compiled by headquarters. Similarly project reports, questionnaires, tabulating sheets, laboratory notes, and other records whose basic data are found to be widely available in well-known government and non-government publications will not usually be considered highly for permanent retention, except possibly in terms of a few representative samples.

In conclusion, what can be stated as the benefits to be obtained from the retention planning program or the identification of records of continuing value? In the first place, it can be a weapon in the fight against useless bureaucratic record-keeping practices. This fight is important to the administrator as well as to the scholar. When the documentation of an agency's work is freed from entangling trivia, it is more effective as an aid to administrative review and evaluation of basic policies, procedures, and programs. These features of an agency become less fugitive and obscure. The resultant record product tends to receive greater respect from top-level administrative and staff officials and win greater interest from them in its use and preservation. Moreover, selective retention of records can facilitate the tasks of research specialists who, like administrators, are benefited by the reduction of masses of records to small and manageable bodies of essential recorded experience. The late Emmett J. Leahy, long the nation's foremost promoter of records management, once stated the value of this reduction of records as follows: "Such reduction is essential to economical management of modern records, to ready access to the experience recorded therein, and to the pressing requirement that we draw more extensively on that experience."

The need for identification of records of continuing value has recently been given special urgency in the United States by findings of the Hoover Commission's Task Force on Paperwork Management and by audits of Federal records management programs by the National Archives and Records Service. These investigations have called attention to the Federal Government's massive records holdings and have shown the need for systematic disposal of records lacking permanent value. Indeed the problem of identifying valuable records is a matter of increasing concern in many countries. The Committee on Departmental Records in England, for example, has declared: "We have no hesitation in saying that the most important requirement in relation to the preservation of modern departmental records is a satisfactory method of selecting those which ought to be preserved." The International Meeting of the Archives Round Table at Namur, Belgium, in 1955 and the Third International Congress on Archives at Florence, Italy, in 1956 focussed attention on the varied and obstinate difficulties involved in "extracting from modern official documents those -- and only those -- which are likely to be valuable to posterity."

The retention planning program is therefore an effort to meet the widely recognized need for identification and retention of records of continuing value. Any progress made in this direction will contribute to the promotion of enlightened and efficient public administration, protection of public and individual interests, and satisfaction of varied needs for knowledge from the nation's rich recorded experience.

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